

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:

LEWISBERRY PARTNERS, LLC,

Debtor

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: CASE NO.: 21-10327-ELF
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: CHAPTER: 11
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: HON. ERIC L. FRANK
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NOTICE OF OPPOSITION TO
DEBTOR'S CONTINUED USE OF CASH COLLATERAL
AND NOTICE OF CROSS MOTION FOR DISBURSEMENT OF CASH PROCEEDS
FROM SALE OF REAL ESTATE AND FOR RELIEF FROM AUTOMATIC STAY and
REQUEST FOR EXPEDITED HEARING, REDUCED NOTICE PERIOD AND
LIMITED NOTICE

PLEASE TAKE NOTICE, the Fay Servicing, LLC as servicer for as servicer for U.S. Bank National Association, not in its individual capacity but solely as Trustee of the HOF Grantor Trust I its successors and assigns (hereinafter "Secured Creditor") seek(s) an order affecting your rights or property.

PLEASE TAKE NOTICE, that Fay Servicing, LLC as servicer for as servicer for U.S. Bank National Association, not in its individual capacity but solely as Trustee of the HOF Grantor Trust I its successors and assigns (hereinafter "Secured Creditor"), by and through undersigned counsel at Friedman Vartolo, LLC, files notice of **opposition to Debtor's Motion for Continued Use of Cash Collateral** and notice of its **Cross Motion for Disbursement of Cash Proceeds from Sale of Real Estate** and notice of it seeking **Relief from the Automatic Stay** and for

Expedited hearing, reduced notice period and limited notice pursuant to Local Bankruptcy Rule 5070-1(f) [the “Motion”].

PLEASE TAKE FURTHER NOTICE that to oppose the Motion you are further instructed to file with the Clerk and serve upon the undersigned attorney For Secured Creditor a response to the Motion in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court, stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

This motion shall be heard on. April 14, 2021 at 11:00 a.m./p.m. before the Honorable Eric L. Frank in the United States Bankruptcy Court, Eastern District of Pennsylvania, 900 Market Street, Philadelphia, PA 19107-4299.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order denying continued use of cash collateral and disbursing cash proceeds from sale of real estate to Secured Creditor and granting Secured Creditor relief from the automatic stay.

Date: April 7, 2021

By: /s/ Lorraine Gazzara Doyle
Lorraine Gazzara Doyle, Esq.
FRIEDMAN VARTOLO LLP
Fay Servicing, LLC as servicer for U.S. Bank
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